

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

-----	X
	:
	: Case No. S4 14-CR-272 (JSR)
	:
	: ECF Case
	:
UNITED STATES OF AMERICA,	: <b>NOTICE OF DEFENDANTS'</b>
	: <b>MOTION TO COMPEL</b>
v.	: <b>FURTHER KASTIGAR</b>
	: <b>DISCOVERY</b>
ANTHONY ALLEN,	:
PAUL THOMPSON,	:
TETSUYA MOTOMURA, and	:
ANTHONY CONTI,	:
	:
Defendants.	:
	:
	:
	:
-----	X

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, and the Exhibits thereto, Defendants Anthony Allen and Anthony Conti, by their attorneys, shall move before the Honorable Jed S. Rakoff of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, seeking an Order compelling further *Kastigar* discovery:

- Opposition papers, if any, are to be served on or before Tuesday, December 29, 2015. No reply papers shall be submitted.

Dated: New York, New York  
December 21, 2015

**WILLKIE FARR & GALLAGHER LLP**

By: /s/ Michael S. Schachter  
Michael Schachter  
Casey E. Donnelly  
787 Seventh Avenue  
New York, New York 10019-6099  
Phone: (212) 728-8000  
Email: mschachter@willkie.com

*Attorneys for Defendant Anthony Allen*

**TOR EKELAND, P.C.**

By: /s/ Tor Ekeland  
(electronic signature w/permission)  
Tor Ekeland  
Aaron Williamson  
195 Plymouth Street, 5<sup>th</sup> Floor  
Brooklyn, New York 11201-1133  
Phone: (718) 737-7264  
Email: tor@torekeland.com

*Attorneys for Defendant Anthony Conti*

To:

Brittain Shaw  
Charles La Bella  
U.S. Department of Justice, Fraud Section  
1400 New York Avenue, NW  
Washington, DC 20005